



Public Power Council

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Evan Lewis
Seattle District
Corps of Engineers
P.O. Box 3755
Seattle, WA 98124-3755

Subject: Columbia River Fish Mitigation System Flood Control Review

Dear Mr. Lewis,

The Public Power Council (PPC) appreciates the opportunity to provide the Corps of Engineers with our reaction to the Corps' Reconnaissance report *Columbia River Fish Mitigation System Flood Control Review*. It is our understanding that the Corps is seeking regional feedback on its proposal to conduct a feasibility study, costing approximately \$30 million over six years, to study the safety of modifying flood control operations. In addition, we understand that the Corps is proposing to use Columbia River Fish Mitigation (CRFM) funds to conduct the study.

PPC is a trade association of consumer-owned utilities throughout the Northwest that purchase federal power from the Bonneville Power Administration (BPA) in order to serve their retail customers' electricity needs. We have a strong interest in how the Corps spends CRFM funds, which are appropriated by Congress, but ultimately repaid almost entirely by BPA through the rates it charges its customers.

Although we understand the importance of the Corps having current knowledge of the parameters for safely operating the Federal Columbia River Power System, we question whether a flood control study is an appropriate use of CRFM funds, which are a valuable but finite resource for improving fish passage through the Columbia River. In short, we believe that the study is not likely to yield information that helps benefit listed species, and that the available CRFM money should be used to implement projects that do have a known benefit for these species.

The Corps intends to spend \$30 million on the study "based on the assumption there is a positive flow/survival relationship,"¹ even though recent scientific inquiry does not appear to support that assumption.² We note that the proposed feasibility study will not do anything to further test the assumption of a positive flow/survival relationship, since it will only study the feasibility of modifying flood control operations, not the actual effect on listed species.

Because the study is unlikely to yield information that will help to benefit fish, we question whether it should be given funding priority over more relevant projects. It is our understanding that the Corps knows of, and has plans to implement projects, such as the installation of removable spillway weirs or predator control programs, that would produce a known benefit to salmon and steelhead species, but that implementation of some of those projects is awaiting available CRFM funds in future years. Under these circumstances, we find it troubling that the Corps is proposing to use substantial CRFM funds to conduct the flood control study.

PPC believes the CRFM funds should be used in a way that produces the largest benefit possible for salmon and steelhead in the Columbia River basin, and we are not satisfied that the proposed feasibility study lives up to this goal. If the Corps determines that a need to update current flood control parameters justifies a study, we suggest that funds other than CRFM monies be used, since flood control is not a purpose of the CRFM funds.

Thank you for your serious consideration of these comments.



Marilyn Showalter
Executive Director
Public Power Council

¹ Reconnaissance report at ii, iii, and 2.

² See INDEPENDENT SCIENTIFIC ADVISORY BOARD, REVIEW OF FLOW AUGMENTATION: UPDATE AND CLARIFICATION, ISAB 2003-1 (Feb. 10, 2003), pp. 2-3 ("The prevailing flow-augmentation paradigm, which asserts that in-river smolt survival will be proportionally enhanced by any amount of added water, is no longer supportable. It does not agree with information now available."); See also Reconnaissance report at 41-42 (describing the uncertainties surrounding the assumption of a positive flow/survival relationship).